

**EXHIBIT C**

Thomas Chen

Boston, MA

December 14, 2005

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THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MDL DOCKET NO. 01CV12257-PBS

**CERTIFIED COPY**

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IN RE: PHARMACEUTICAL  
INDUSTRY AVERAGE WHOLESALE  
PRICE LITIGATION

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THIS DOCUMENT RELATES TO:

ALL ACTIONS

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VIDEOTAPED DEPOSITION of THOMAS CHEN, a witness  
called on behalf of the Plaintiffs pursuant to the  
Federal Rules of Civil Procedure, before Judith  
McGovern Williams, Certified Shorthand Reporter,  
Registered Professional Reporter, Certified Realtime  
Reporter, and Notary Public in and for the  
Commonwealth of Massachusetts, at the offices of  
Foley Hoag, 155 Seaport Boulevard, Boston,  
Massachusetts 02210, on Wednesday, December 14,  
2005, commencing at 1:23 p.m.

Henderson Legal Services  
(202) 220-4158

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1 manager, did Zeneca ever engage in the provision  
2 of grants connected to purchase of Zoladex?

3 MS. HARRIS: You already asked him that  
4 question and he already answered it.

5 A. No.

6 Q. No?

7 A. Not to my knowledge.

8 Q. And did Zeneca ever provide free samples  
9 to physicians and encourage them to seek  
10 reimbursement for them?

11 A. Not to my knowledge.

12 MR. SIEVERT: Okay. Can we just take a  
13 short break?

14 THE WITNESS: Sure.

15 MS. HARRIS: Sure.

16 THE VIDEOGRAPHER: The time is 4:50.

17 We're off the record.

18 (Recess taken at 4:50 p.m.)

19 (Recess ended at 4:56 p.m.)

20 THE VIDEOGRAPHER: The time is 4:57.

21 We're on the record.

22 (One-page e-mail dated April 4, 1996, to

Henderson Legal Services  
(202) 220-4158